

1 Name: TODD MICHAEL SCHULTZ

2 Address: 818 N DOHENY DR. #1108

3 WEST HOLLYWOOD, CA 90069

4 Phone: 310-435-5847

5 In Pro Per

6

7

8 **UNITED STATES DISTRICT COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA**

10 TODD MICHAEL SCHULTZ

11 Plaintiff

12 CASE NUMBER:

13 2:23-CV-03452-JAK-MRWx

14 To be supplied by the Clerk of
15 The United States District Court

16 MICHAEL C. THOMPSON
17 GREGORY R. HOLMES
18 YOUTUBE LLC

19 Defendant(s).

20 DECLARATION TO SHOW
21 WHY PLAINTIFF SHOULD
22 NOT PAY SANCTIONS TO
23 THE DEFENSE OR
24 COURT

25 PLAINTIFF, TODD MICHAEL SCHULTZ, understood the RFA's as not
26 being overseen by the courts until the "discovery". He construed there to be
27 nuance in this matter. He believed that Judge Wilner's striking of the document
28 was merely reflecting that "inter-party discovery" did not constitute "discovery."
It was and is a legal theory. Plaintiff does not believe there has been cooperation
but does not know how to iterate it properly to the court. Plaintiff believed that
filing the OBJECTIONS to the RFA would demonstrate a lack of cooperating.

Plaintiff asks the court for mercy and understand that he believed that the
RFA would not be "discovery" until it was lodged under Judge Wilner. This very
well may have been a midjudgment and Plaintiff is apologetic and still not very
clear on the differences between discovery, exhibits and the like. .

1 Plaintiff in Pro Per, takes responsibility and asks the court for mercy for
2 failing to adhere to the rules that he should have known and implemented
3 with more of a beginner's mind. Plaintiff did not see Docket # 36 as a motion.
4

5 Plaintiff believed it was superfluous, not denied. A mistake to file at that time
6 as discovery had not begun. However, the definition and scope of discovery
7 seems to be debated online and I firmly believed that inter-party communications
8 did not constitute discovery after doing potentially bad research.
9

10 Plaintiff assumes responsibility and will abide the courts
11 decision. Plaintiff apologizes thoroughly for any harm caused to the court or
12 opposing counsel through his actions. He was merely caught up in a
13 difficult and complicated process that he is sworn to learn and uphold if he
14 decides to use it. He also swears under penalty of perjury that all stated
15 here is true.

16 Signed by:
17

18 Dated August 21.2023

Todd Michael Schultz

19 Mr. Thompson and Mr. Holmes' counsel
20 Mark D. Hurwitz

(Plaintiff)

21
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